

JORGE L. SANCHEZ, ESQ.
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Phone (702) 635-8529
Attorney for Debtors

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:)	BK-09-22787-lbr
)	
ABEL CASTRO)	
)	CHAPTER 13
&)	
)	OPPOSITION TO MOTION FOR
SOCORRO CASTRO)	RELIEF FROM STAY
)	
)	DATE: November 4, 2009
Debtor(s).)	TIME: 10:30 a.m.
)	

COME NOW the above-named debtors, Abel Castro & Socorro Castro (hereinafter “**Debtors**”), by and through their attorney of record, Jorge L. Sanchez, of the law firm of Sanchez Law Group, Ltd., and hereby file the instant Opposition to the Motion for Relief from Stay filed by the secured creditor, Select Mortgage Inc. (hereinafter “**Select Mortgage**”), in regards to Debtor’s real property located at 3110 Cummins Ct., North Las Vegas, NV 89030 (the “**Subject Property**”). In support thereof, Debtor states as follows:

Select Mortgage should not be granted relief from stay because Debtors have made timely payments to the Trustee as is required by their Chapter 13 plan. Proof of Debtors’ payments to the Trustee is attached as Exhibit “A” hereto. Select Mortgage’s claim is among those to be paid by the Debtors’ Chapter 13 Plan. As such, Select Mortgage has received or will receive payments from the Debtors through the confirmed Chapter 13 Plan and has no legal recourse against the debtors and the stay should not be lifted or modified.

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1 WHEREFORE, Debtors, by counsel, respectfully requests this Honorable Court to fully
2 deny the relief requested by Select Mortgage in its Motion for Relief from Stay.

3 Dated this the 20th day of October, 2009.

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5 /s/Jorge L. Sanchez, Esq.
6 JORGE L. SANCHEZ, ESQ.
7 Attorney for Debtor
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1. On October 20th, 2009, I served the following document(s):

OPPOSITION TO MOTION FOR RELIEF FROM STAY. I served the above-named

document(s) by the following means to the persons as listed below:

a. ECF System

Kathleen A. Leavitt, Chapter 13 Trustee

Gregory L. Wilde, Esq.
Attorney for Creditor, Select Mortgage, Inc.
Wilde & Associates
208 South Jones Blvd.
Las Vegas, NV 89107

b. Certified United States mail, postage fully prepaid, addressed as follows:

c. Personal Service

I personally delivered the document(s) to the persons at these addresses:

d. By direct email

1 Based upon the written agreement of the parties to accept service by email or a court
2 order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did
3 not receive, within a reasonable time after the transmission, any electronic message or other
4 indication that the transmission was unsuccessful.

5 e. By fax transmission

6 Based upon written agreement of parties to accept service by fax transmission or a court
7 order, I faxed the document(s) to the persons at the fax numbers listed below. No error was
8 reported by the fax machine that I used. A copy of the fax transmission is attached.

9 f. By messenger

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Dated: October 20, 2009

12 /s/Brandy Goodwin/s/

13 An employee of Sanchez Law Group
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